STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

athenahealth, Inc. **Waldo County** **Belfast, Maine** **A-991-71-C-A (SM)**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Amendment #1**

FINDINGS OF FACT

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Athenahealth, Inc. (athenahealth) was issued Air Emission License A-991-71-B-N on October 12, 2012, for the operation of emission sources associated with their electronic medical records (EMR) management facility.

Athenahealth has requested an amendment to their license in order to add a new generator to their license, add four new propane-fired boilers to their license, and remove two distillate fuel-fired boilers from their license. The Department has also taken this opportunity to update the operating hours restrictions for Generators #1-3 to reflect the restrictions included in *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ.

The equipment addressed in this license amendment is located at 3 Hatley Road, Belfast, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license amendment:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #1P	1.08	11.8	Propane	2014	2015	P#1
Boiler #2P	1.08	11.8		2014	2015	P#2
Boiler #3P	2.25	24.6		2016	2016	P#3
Boiler #4P	2.25	24.6		2016	2016	P#4

Boilers #1 and #2, listed on Air Emission License A-991-71-B-N (October 12, 2012) have been removed from the facility and are hereby removed from this air emission license.

Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (kW)	Fuel Type, % sulfur	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.	Stack #
Generator #1	8.1	800	Distillate fuel, 0.0015%	59.1	1995	1996	G#1
Generator #2	8.1	800		59.1	1995	1996	G#2
Generator #3	0.7	60		5.3	1997	1999	G#3
Generator #4*	2.63	250		19.2	2015	2015	G#4

*New to the license

C. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emission" levels as defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (TPY)	Future License (TPY)	Net Change (TPY)	Significant Emission Levels
PM	2.0	1.9	-0.1	100
PM_{10}	2.0	1.9	-0.1	100
SO_2	5.9	0.6	-5.3	100
NO_x	17.0	7.4	-9.6	100
CO	4.0	3.2	-0.8	100
VOC	0.6	0.7	+0.1	50
CO_2e	<100,000	<100,000	--	100,000

This modification is determined to be a minor modification and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Boilers #1P, #2P, #3P, and #4P

Athenahealth operates Boilers #1P, #2P, #3P, and #4P for heat and hot water. The boilers are rated at 1.08 MMBtu/hr, 1.08 MMBtu/hr, 2.25 MMBtu/hr, and 2.25 MMBtu/hr, respectively. All four boilers fire propane. Boilers #1P and #2P were installed in 2015, and Boilers #3P and #4P were installed in 2016. All four boilers exhaust through their own individual stacks.

1. BACT Findings

The BACT emission limits for the boilers were based on the following:

PM/PM_{10}	–	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BACT
SO_2	–	0.018 lb/1,000 gal. based on AP-42, Table 1.5-1, dated 7/08
NO_x	–	13 lb/1,000 gal. based on AP-42, Table 1.5-1, dated 7/08
CO	–	7.5 lb/1,000 gal. based on AP-42, Table 1.5-1, dated 7/08
VOC	–	1.0 lb/1,000 gal. based on AP-42, Table 1.5-1, dated 7/08
Visible Emissions	–	06-096 C.M.R. ch. 115, BACT

The BACT emission limits for the boilers are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boilers #1P and #2P [each]	0.05	0.05	0.01	0.16	0.09	0.01
Boilers #3P and #4P [each]	0.11	0.11	0.01	0.32	0.19	0.02

Visible emissions from each boiler shall not exceed 10% opacity on a six-minute block average basis.

2. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to their size, the boilers are not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

3. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJJ

Boilers #1P, #2P, #3P, and #4P are not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. The units are considered gas-fired boilers. [40 C.F.R. §§63.11193 and 63.11195]

Gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJJ. However, boilers which fire fuel oil are not. A "gas-fired boiler" is defined as any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [40 C.F.R. § 63.11237]

Any boiler designed to burn fuels besides gaseous fuels prior to June 4, 2010, will be considered an existing boiler under this rule. A boiler which currently fires gaseous fuels, but converts back to firing another fuel (such as distillate fuel) in the future would become subject as an existing boiler at the time it is converted back to oil.

C. Generator #4

Athenahealth operates Generator #4 as an emergency generator. The emergency generator is a generator set consisting of an engine and an electrical generator. Generator #4 has an engine rated at 2.63 MMBtu/hr which fires distillate fuel. Generator #4 was manufactured in 2015.

1. BACT Findings

The BACT emission limits for Generator #4 are based on the following:

PM/PM_{10}	- 0.12 lb/MMBtu from 06-096 C.M.R. ch. 115, BACT
SO_2	- combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	- 4.41 lb/MMBtu from AP-42, Table 3.3-1, dated 10/96
CO	- 0.95 lb/MMBtu from AP-42, Table 3.3-1, dated 10/96
VOC	- 0.35 lb/MMBtu from AP-42, Table 3.3-1, dated 10/96
Opacity	- 06-096 C.M.R. ch. 115, BACT

The BACT emission limits for Generator #4 are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #4 (2.63 MMBtu/hr)	0.32	0.32	0.01	11.60	2.50	0.92

Visible emissions from Generator #4 shall not exceed 20% opacity on a six-minute block average basis.

2. 40 C.F.R. Part 60, Subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart IIII is applicable to the emergency engine listed above since the unit was ordered after July 11, 2005, and manufactured after April 1, 2006. [40 C.F.R. § 60.4200] By meeting the requirements of 40 C.F.R. Part 60, Subpart IIII, the unit also meets the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

A summary of the currently applicable federal 40 C.F.R. Part 60, Subpart IIII requirements is listed below. At this time, the Department has not taken delegation of this federal rule promulgated by EPA; however, athenahealth is still subject to the requirements.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 60, Subpart IIII, a stationary reciprocating internal combustion engine (ICE) is considered an **emergency** stationary ICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 60, Subpart IIII, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or

local standards require maintenance and testing of emergency ICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 C.F.R. §§ 60.4211(f) and 60.4219]

b. 40 C.F.R. Part 60, Subpart IIII Requirements

(1) Manufacturer Certification Requirement
The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 C.F.R. § 60.4202. [40 C.F.R. § 60.4205(b)]

(2) Ultra-Low Sulfur Fuel Requirement
The fuel fired in the engine shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.
[40 C.F.R. § 60.4207(b)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

(4) Operation and Maintenance Requirements
The engine shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by athenahealth that are approved by the engine manufacturer. Athenahealth may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

(5) Annual Time Limit for Maintenance and Testing
As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 60.4211(f)]

(6) Initial Notification Requirement
No initial notification is required under 40 C.F.R. Part 60, Subpart IIII for emergency engines. [40 C.F.R. § 60.4214(b)]

(7) Recordkeeping
Athenahealth shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

D. Generators #1-3 Operating Hours Restriction

Generators #1-3 were previously limited to 500 hours per year of non-emergency and emergency operation combined, based on a 12-month rolling total. As part of this air emission license amendment, this restriction is being updated to be consistent with the restriction currently in 40 C.F.R. Part 63, Subpart ZZZZ. Beginning with this amendment, Generators #1-3 shall each be limited to 100 hours of operation per calendar year, excluding operation during emergency situations. There is no limit on emergency operation. The facility's licensed annual emissions totals are also updated to reflect this change.

E. Annual Emissions

Athenahealth shall be restricted to the following annual emissions, based on a calendar year total. The tons per year limits were calculated based on 8,760 hours of operation per year for each of the boilers and 100 hours of operation per year for the generators:

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boilers #1P & #2P	0.5	0.5	0.1	1.3	0.8	0.1
Boilers #3P & #4P	1.0	1.0	0.1	2.8	1.6	0.2
Generator #1	0.1	0.1	0.1	1.3	0.3	0.1
Generator #2	0.1	0.1	0.1	1.3	0.3	0.1
Generator #3	0.1	0.1	0.1	0.1	0.1	0.1
Generator #4	0.1	0.1	0.1	0.6	0.1	0.1
Total TPY	**1.9**	**1.9**	**0.6**	**7.4**	**3.2**	**0.7**

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM_{10}	25
SO_2	50
NO_x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-991-71-C-A subject to the conditions found in Air Emission License A-991-71-B-N and the following conditions.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

The following shall replace Conditions (16) and (17) of Air Emission License A-991-71-B-N (issued October 12, 2012):

(16) **Boilers #1P-#4P**

A. Boilers #1P-#4P are each licensed to fire propane and to operate 8,760 hours per year. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BACT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boilers #1P & #2P [each]	0.05	0.05	0.01	0.16	0.09	0.01
Boilers #3P & #4P [each]	0.11	0.11	0.01	0.32	0.19	0.02

C. Visible emissions from Boilers #1P-#4P shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

(17) **Generators #1-4**

A. Generators #1-4 shall each be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]

B. The distillate fuel sulfur content for Generators #1-4 shall be limited to 0.0015% by weight (15 ppm). Compliance shall be demonstrated by fuel records from the supplier documenting the type and sulfur content of the fuel delivered. [06-096 C.M.R. ch. 115, BPT]

C. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Generators #1-2 [each]	PM	0.12	06-096 C.M.R. ch. 103 § (2)(B)(1)(a)

D. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BACT for Generator #4; 06-096 C.M.R. ch. 115, BPT for Generators #1-3]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1 (8.1 MMBtu/hr)	0.97	0.97	0.01	25.92	6.89	0.73
Generator #2 (8.1 MMBtu/hr)	0.97	0.97	0.01	25.92	6.89	0.73
Generator #3 (0.7 MMBtu/hr)	0.08	0.08	0.001	2.24	0.60	0.06
Generator #4 (2.63 MMBtu/hr)	0.32	0.32	0.01	11.60	2.50	0.92

E. Visible Emissions

1. Visible emissions from Generators #1-3 shall each not exceed 20% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period. [06-096 C.M.R. ch. 101]
2. Visible emissions from Generator #4 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

F. The Emergency Generators #1, #2, and #3 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:
[incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Athenahealth shall meet the following operational limitations for each of the compression ignition emergency engines:

   a. Change the oil and filter annually,
   b. Inspect the air cleaner annually and replace as necessary, and
   c. Inspect the hoses and belts annually and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d) & 06-096 C.M.R. ch. 115, BPT]

2. Oil Analysis Program Option
Athenahealth has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, athenahealth must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

3. Non-Resettable Hour Meter
A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

   a. As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise to supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) & 06-096 C.M.R. ch. 115, BPT]

   b. Athenahealth shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance
The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or athenahealth shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of each engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization
   During periods of startup, the facility must minimize each engine's time spent at idle and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

G. Generator #4 shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart IIII, including the following: [incorporated under 06-096 C.M.R. ch. 115, BACT]

1. Manufacturer Certification
   The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in §60.4202. [40 C.F.R. § 60.4205(b)]

2. Ultra-Low Sulfur Fuel
   The fuel fired in the engine shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Compliance with the fuel sulfur content limit shall be based on fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [40 C.F.R. § 60.4207(b) & 06-096 C.M.R. ch. 115, BACT]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

4. Annual Time Limit for Maintenance and Testing
   a. As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written log) of all engine operating hours. [40 C.F.R. § 60.4211(f) & 06-096 C.M.R. ch. 115, BACT]

   b. Athenahealth shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

5. Operation and Maintenance
   The engine shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by athenahealth that are approved by the engine manufacturer. Athenahealth may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

DONE AND DATED IN AUGUSTA, MAINE THIS 5 DAY OF September , 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-991-71-B-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/24/2017
Date of application acceptance: 7/27/2017

Date filed with the Board of Environmental Protection:

This Order prepared by Jonathan E. Rice, Bureau of Air Quality.